

Remarks

The Applicants note the objection to the Abstract and have amended it accordingly. A copy of the Abstract on a separate sheet of paper is enclosed for the Examiner's convenience.

The Applicants note with appreciation the Examiner's helpful comments concerning the Information Disclosure Statement submitted by the Applicants. The Applicants have compared the original PTO-1449 Form submitted by the Applicants to the PTO-892 Form prepared by the Examiner in the Official Action and note that all three of the publications not considered in the Applicants' Information Disclosure have been added to the Examiner's PTO-892 Form. Accordingly, the Applicants note that all three publications have now been duly entered into the file and considered on the merits.

The Applicants have added new Claims 19 and 20. Support may be found at page 32, line 25, through page 33, lines 1 and 2 and elsewhere; and at page 9, lines 12-15, respectively. Entry into the official file is respectfully requested.

The Applicants note the rejection of Claims 2-3 under 35 U.S.C. §112. The Applicants also note with appreciation the Examiner's helpful comments. Claim 2 has been amended so that it now recites that the water-insoluble heat-sensitive mask layer (C) contains crosslinked curable resin. Withdrawal of the §112 rejection of Claims 2-3 is respectfully requested.

The Applicants note the rejection of Claims 12 and 15 under 35 U.S.C. §102 as being anticipated by Peterson. The Applicants have amended Claim 12 to include the subject matter of Claims 13 and 14. Claims 13 and 14 have accordingly been cancelled. The Applicants respectfully submit that the inclusion of the subject matter of Claims 13 and 14 into Claim 12 now renders the rejection of Claims 12 and 15 based on Peterson as being moot. Withdrawal of the rejection is respectfully requested.

The Applicants note the rejection of Claims 1, 4-5, 7-8, 10, 12 and 17-18 under U.S.C. §103 over the hypothetical combination of Bauer or Dietrich with Peterson as further evidenced by Taggi. The Applicants have amended Claim 12 to include the subject matter of Claims 13 and 14, thereby rendering the rejection moot as it applies to Claim 12. Also, Claim 17 has been cancelled, thereby rendering that portion of the rejection moot as well. The Applicants respectfully submit that the remaining Claims are not obvious over the combination for the reasons set forth in detail below.

With respect to Claims 1, 4-5, 7-8 and 10, the Applicants have amended Claim 1 to include the subject matter of Claim 10. Claim 10 has been cancelled, thereby rendering that portion of the

rejection moot. The Applicants have also amended Claim 1 to recite the fact that the peel assist layer (D) has a thickness of 0.1 to 6 μm . Support may be found in the Applicants' specification in the paragraph spanning pages 33 and 34, for example. The Applicants respectfully submit that Peterson fails to disclose this. Peterson discloses a planographic printing plate comprising an aluminum base/ultraviolet sensitive coating/adhesive/polycarbonate film/vacuum deposited zinc layer. The vacuum deposited zinc layer does not contact the ultraviolet sensitive coating. The vacuum deposited zinc layer instead contacts the adhesive. However, the Peterson adhesive layer is clearly distinguished from the adhesion-adjusting layer (B) of Claim 1 because the Peterson adhesive layer does not contain a water-soluble or water-dispersible resin. Also, Peterson fails to disclose a peel assist layer (D) having a thickness of 0.1 to 6 μm .

The rejection also relies on Dietrich or Bauer. The problem with both of those disclosures is that they fail to disclose a water-insoluble mask layer (C). Further, Dietrich fails to disclose a peel assist layer (D) having a thickness of 0.1 to 6 μm . In fact, Dietrich fails to disclose the thicknesses of any component. Thus, even if one skilled in the art were to hypothetically combine Dietrich with Peterson, the resulting structure would still fail to teach or suggest the subject matter of Claims 1, 4-5 and 7-8.

The Applicants respectfully submit that Bauer also fails to provide teachings or suggestions to one skilled in the art that would cure the deficiencies set forth above with respect to Peterson. In particular, Peterson also fails to disclose a peel assist layer (D) having a thickness of 0.1 to 6 μm . As a consequence, even if one skilled in the art were to hypothetically combine Bauer with Peterson, the resulting structure would still fail to teach or suggest the subject matters of Claims 1, 4-5 and 7-8. Withdrawal of the rejection of Claims 1, 4-5 and 7-8 is respectfully requested.

With respect to Claim 18, the Applicants respectfully submit that the hypothetical combination of Bauer or Dietrich with Peterson fails essentially for the same reasons set forth above with respect to Claims 1, 4-5 and 7-8. In particular, the hypothetical combination fails to teach or suggest the water-insoluble mask layer (C) together with the combination of the peel assist layer (D) having a thickness of 0.1 to 6 μm and protective layer (E). Withdrawal of the rejection of Claim 18 is respectfully requested.

The Applicants note the rejection of Claims 1, 4, 9-10, 12 and 17-18 under 35 U.S.C. §103 over Fan '838. As previously noted, the Applicants have amended Claim 12 to include the subject matter of Claims 13 and 14. The Applicants respectfully submit that this renders the rejection with

respect to Claim 12 as being moot. Also, Claim 17 has been cancelled. Further, Claim 1 has been amended to include the subject matter of Claim 10, which has now been cancelled, and the inclusion of the thickness of the peel assist layer (D) as being 0.1 to 6 μm .

The Applicants respectfully submit that Fan '838 fails to teach or suggest the subject matter of Claims 1, 4 and 9. This can immediately be seen by virtue of the fact that Fan '838 discloses a flexographic printing plate and not a photosensitive resin printing plate for letterpress printing. These are completely different items. Also, although Fan '838 discloses that the coversheet can be subbed with release layers such as silicone-released treated polyester, there is a complete failure to disclose, teach or suggest the thickness of a peel assist layer (D) as recited in those claims. Withdrawal of the rejection as it applies to Claims 1, 4 and 9 is respectfully requested.

With respect to Claim 18, the Applicants respectfully submit that Fan '838 fails to teach or suggest the subject matter of that Claim as well. Again, Fan '838 relates to flexographic printing plates, while Claim 18 specifically recites a method for producing letterpress printing plates. These are completely different as noted before. Also, there is a failure by Fan '838 to disclose, teach or suggest the thickness of a peel assist layer (D) as recited in Claim 18. Withdrawal of the rejection as it applies to Claims 18 is also respectfully requested.

The Applicants note the rejection of Claim 12 under 35 U.S.C. §102 as being anticipated by Fan '838. The Applicants have amended Claim 12 to include the subject matter of Claims 13 and 14, thereby rendering the rejection based on Fan '838 as being moot. Withdrawal of the rejection is respectfully requested.

The Applicants note the rejection of Claims 1, 8, 10, 12-14 and 17-18 under 35 U.S.C. §102 as being anticipated by Fan '330. The Applicants note that Claims 10 and 17 have been cancelled, thereby rendering that portion of the rejection as being moot. The Applicants respectfully submit that the remainder of the Claims are not anticipated by Fan '330.

Claim 1 recites a photosensitive resin printing plate precursor for letterpress printing. Fan discloses flexographic printing plates which are well known to those skilled in the art as being completely different. On this basis alone, the Applicants respectfully submit that Fan fails to anticipate Claims 1, 8, 12-14 and 18. However, there are more differences.

Claims 1, 12 and 18 also recite the presence of a protective layer (E) and a peel assist layer (D) having a thickness of 0.1 to 6 μm . The Applicants respectfully submit that Fan '330 fails to disclose this. For example, Fan provides no thicknesses for a peel assist layer (D). As a

consequence, the Applicants respectfully submit that Fan '330 fails to anticipate all of Claims 1, 8, 12-14 and 18. Withdrawal of the rejection is respectfully requested.

The Applicants note the rejection of Claims 1-7, 9-12 and 16 under U.S.C. §102 as being anticipated by Tanaka. The Applicants have amended Claim 1 to include the subject matter of Claim 10, among other things, and have amended Claims 12 to contain the subject matter of Claims 13 and 14. The Applicants therefore respectfully submit that the rejection of Claims 1-7, 9, 11-12 and 16 (Claim 10 having been cancelled) has been rendered moot. Withdrawal of the rejection is respectfully requested.

The Applicants note the rejection of Claims 1, 8 and 15 under U.S.C. §103 over the hypothetical combination of Peterson with Tanaka. The Applicants have amended Claim 1 to include the subject matter of Claim 10 and have amended the subject matter of Claim 12 (from which Claim 15 depends) with the subject matter of Claims 13 and 14. The Applicants therefore respectfully submit the rejection of Claims 1-8 and 15 based on the hypothetical combination of Peterson with Tanaka has been rendered moot. Withdrawal of the rejection is respectfully requested.

In light of the foregoing, the Applicants respectfully submit that the entire application is now condition for allowance, which is respectfully requested.

Respectfully submitted,



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